

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

BLUESTONE INNOVATIONS, LLC,	)	
	)	
Plaintiff	)	
	)	
v.	)	Case No. 2:12CV503-HCM-LRL
	)	
LG ELECTRONICS, INC., <i>et al.</i>	)	
	)	
Defendants.	)	
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**UNOPPOSED MOTION TO EXTEND TIME FOR DEFENDANTS**  
**LG ELECTRONICS, INC. AND LG ELECTRONICS U.S.A., INC. .**  
**TO FILE RESPONSIVE PLEADINGS**

Defendants LG Electronics, Inc. and LG Electronics, U.S.A., Inc. (collectively “LG”) hereby move for an extension of time for LG to answer or otherwise respond to the Complaint. LG requests that the current deadline be extended by 90 days, from October 23, 2012 up to and including January 22, 2013. Plaintiff Bluestone Innovations, LLC does not oppose this motion. Pursuant to Local Civil Rule 7, all parties agree to submit this motion for expedited ruling without oral argument.

LG Electronics, Inc. has agreed to waive service of process under the Hague Convention pursuant to Federal Rule of Civil Procedure 4(d) and thus is permitted 90 days to respond to the complaint. An extension of 90 days will synchronize the responses of LG and permit coordination of defenses between LG Electronics, Inc. and LG Electronics, U.S.A., Inc., and Plaintiff agrees to the 90 day extension. Thus, good cause exists to grant the motion and the interest of justice will not be undermined by this grant of an extension.

For good cause, as outlined above, the parties respectfully request that the Court grant this unopposed Motion.

Dated: October 22, 2012

Respectfully submitted,

By: /s/ Robert J. Kenney

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**ATTORNEYS FOR DEFENDANTS  
LG ELECTRONICS, INC. AND LG  
ELECTRONICS U.S.A., INC.**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 22<sup>nd</sup> day of October, 2012, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system. I further certify that on the same date, a copy of the foregoing was served via the Court's ECF system to the counsel listed below:

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